

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

---

In re:	)	Chapter 11
	)	
ALEXANDER E. JONES,	)	Case No. 22-33553 (CML)
	)	
Debtors.	)	
	)	

---

**NOTICE OF FILING OF PROPOSED AGREED  
SCHEDULING ORDER FOR CONFIRMATION HEARING**

**PLEASE TAKE NOTICE** that, on November 21, 2023, Alexander E. Jones, as debtor and debtor in possession (“Jones” or the “Debtor”) in the above captioned chapter 11 case (the “Jones Case”) filed the *Debtor’s Motion Requesting Status Conference* [ECF No. 494].

**PLEASE TAKE FURTHER NOTICE** that, on November 22, 2023, the Committee, the Texas Plaintiffs and the Connecticut Plaintiffs filed the *Statement by the Official Committee of Unsecured Creditors and the Sandy Hook Families Regarding Status of the Chapter 11 Case and Proposed Creditors’ Plan* [ECF No. 498].

**PLEASE TAKE FURTHER NOTICE** that, on November 27, 2023, the Court held a status conference regarding a confirmation timeline in the Jones Case and the pending bankruptcy case of Free Speech Systems, LLC (“FSS” and such case, the “FSS Case”).

**PLEASE TAKE FURTHER NOTICE** that the Jones, the Committee, the Texas Plaintiffs and the Connecticut Plaintiffs (together, the “Parties”) have met and conferred as to a proposed schedule in respect of a confirmation hearing in the Jones Case and have agreed to the *Proposed Agreed Scheduling Order for Confirmation Hearing* attached hereto as Exhibit A (the “Proposed Order”).

**PLEASE TAKE FURTHER NOTICE THAT** the Proposed Order was shared with counsel to FSS in an effort to reach global consensus regarding a confirmation timeline for both the Jones Case and the FSS Case. FSS has not agreed to be bound the dates contained therein. Accordingly, the Parties request that the Court enter a separate order in the FSS Case that comports with the timeline contemplated by the Proposed Order.

*[Remainder of page intentionally blank]*

Dated: November 30, 2023

**AKIN GUMP STRAUSS HAUER & FELD LLP**

By: /s/ Marty L. Brimmage, Jr.

Marty L. Brimmage, Jr.

Texas Bar No. 00793386

2300 N. Field Street, Suite 1800

Dallas, Texas 75201

Telephone: (214) 969-2800

Fax: (214) 969-4343

E-mail: [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com)

-and-

David M. Zensky (admitted *pro hac vice*)

Sara L. Brauner (admitted *pro hac vice*)

Katherine Porter (admitted *pro hac vice*)

Anna Kordas (admitted *pro hac vice*)

One Bryant Park

New York, NY 10036

Telephone: (212) 872-1000

Fax: (212) 872-1002

E-mail: [dzensky@akingump.com](mailto:dzensky@akingump.com)

E-mail: [sbrauner@akingump.com](mailto:sbrauner@akingump.com)

E-mail: [kporter@akingump.com](mailto:kporter@akingump.com)

E-mail: [akordas@akingump.com](mailto:akordas@akingump.com)

*Counsel to the Official Committee of Unsecured Creditors of Alexander E. Jones*

Respectfully submitted,

**CAIN & SKARNULIS PLLC**

By: /s/ Ryan E. Chapple

Ryan E. Chapple

State Bar No. 24036354

303 Colorado Street, Suite 2850

Austin, TX 78701

Telephone: (512) 477-5000

Fax: (512) 477-5011

E-mail: [rchapple@ctrial.com](mailto:rchapple@ctrial.com)

**KOSKOFF KOSKOFF & BIEDER, PC**

Alinor C. Sterling (admitted *pro hac vice*)

350 Fairfield Avenue

Bridgeport, CT 06604

Telephone: (203) 336-4421

E-mail: [asterling@koskoff.com](mailto:asterling@koskoff.com)

**PAUL, WEISS, RIFKIND,**

**WHARTON & GARRISON LLP**

Kyle J. Kimpler (admitted *pro hac vice*)

Christopher Hopkins (admitted *pro hac vice*)

1285 Avenue of the Americas

New York, NY 10019-6064

Telephone: (212) 373-3000

Fax: (212) 757-3990

E-mail: [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com)

E-mail: [chopkins@paulweiss.com](mailto:chopkins@paulweiss.com)

*Co-Counsel to the Connecticut Plaintiffs*

**MCDOWELL HETHERINGTON LLP**

By: /s/ Avi Moshenberg

Avi Moshenberg  
State Bar No. 24083532  
1001 Fannin Street, Suite 2700  
Houston, TX 77002  
Telephone: (713) 337-5580  
Fax: (713) 337-8850  
E-mail: Avi.Moshenberg@mhllp.com

**CHAMBERLAIN, HRDLICKA,  
WHITE, WILLIAMS & AUGHTRY, PC**

Jarrod B. Martin  
State Bar No. 24070221  
1200 Smith Street, Suite 1400  
Houston, TX 77002  
Telephone: (713) 356-1280  
Fax: (713) 658-2553  
E-mail: jarrod.martin@chamberlainlaw.com

**WILLKIE FARR & GALLAGHER LLP**

Jennifer J. Hardy  
State Bar No. 24096068  
600 Travis Street  
Houston, TX 77002  
Telephone: (713) 510-1766  
Fax: (713) 510-1799  
E-mail: jhardy2@willkie.com

**WILLKIE FARR & GALLAGHER LLP**

Rachel C. Strickland (admitted *pro hac vice*)  
Stuart R. Lombardi (admitted *pro hac vice*)  
Ciara A. Sisco (admitted *pro hac vice*)  
787 Seventh Avenue  
New York, NY 10019  
Telephone: (212) 728-8000  
Fax: (212) 728-8111  
E-mail: rstrickland@willkie.com  
E-mail: slombardi@willkie.com  
E-mail: csisco@willkie.com

***Co-Counsel to the Texas Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 30, 2023, a true and correct copy of the foregoing document was served via email through the Bankruptcy Court's Electronic Case Filing System on the parties that have consented to such service.

\_\_\_\_\_  
*/s/ Marty L. Brimmage, Jr.*  
Marty L. Brimmage, Jr.